

1 Noel Grefenson
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7 Attorney for Josh Hall

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE DISTRICT OF OREGON

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 JOSH HALL,

14 Defendant.

Case No.: CR 10-229 BR

DECLARATION OF NOEL GREFENSON
IN SUPPORT OF MOTION TO CONTINUE
TRIAL

15 Under the penalty for perjury, I, Noel Grefenson, hereby certify that the following
16 facts are true and correct to the best of my knowledge and belief:

17 1. I am substitute counsel for defendant Josh Hall, who is charged in this case
18 with Bank Fraud and making False Statements to a Bank in the District of Oregon. I was
19 appointed by this Court on March 11, 2011.

20 2. Mr. Hall is out of custody pending resolution his charges.

21 3. Trial in this case is set for November 14, 2011.

22 4. On September 17, 2011, I received a revised plea offer from the
23 Government. Among other things, the revised agreement requires Mr. Hall to plead guilty
24 to a misdemeanor offense after which the Government will move to dismiss the pending

1 Indictment and recommend a probationary sentence. After discussing the terms of this
2 agreement with me, Mr. Hall agreed to accept the Government's offer. Counsel for the
3 parties, however, agreed to delay entry of Mr. Hall's plea until after resolution of his
4 codefendant's case.

5 5. On October 26, 2011, the co-defendant in this case, David J. VanBeenen,
6 entered a plea of guilty to a Superseding Information. The parties now require a short
7 delay of the present trial date in order to accommodate Mr. Hall's change of plea.

8 6. I have discussed Mr. Hall's speedy trial rights with him on multiple
9 occasions, including again on November 7, 2011. Mr. Hall is aware of his speedy trial
10 rights and agrees that a postponement of his scheduled trial date is reasonable and
11 necessary for the reasons stated above.

12 7. Counsel for the Government, Michelle Kerin, has no objection to the
13 requested continuance.

14 8. For the reasons stated above and considering that a postponement will
15 facilitate the fair and just resolution of this case, I maintain that under Title 18 U.S.C §
16 3161(h)(7)(A), (B) the ends of justice served by postponement of a trial herein outweigh
17 the interest of the public and the defendant in a speedy trial.

18 Dated: November 10, 2011.

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20 */s/ Noel Grefenson*

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22 Noel Grefenson, OSB No. 88216
23 Attorney for Defendant Hall